

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION**

United States District Court  
Southern District of Texas  
FILED

AUG 18 2015

David J. Bradley, Clerk

**UNITED STATES OF AMERICA**

**v.**

**JOSE ISMAEL LOPEZ**

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§

**Criminal No.**

**M-15-1114**

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**Count One**

On or about July 23, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**JOSE ISMAEL LOPEZ**

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jurors to transport and move said aliens within the United States in furtherance of such violation of law, that is, from a location near Rio Grande City, Texas, to another location near Rio Grande City, Texas, by means of a motor vehicle.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

**Count Two**

On or about July 23, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**JOSE ISMAEL LOPEZ**

knowing and in reckless disregard of the fact that Ricardo Ayala-Quijada was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly transport,

move, attempt to transport, and attempt to move said alien within the United States in furtherance of such violation of law, that is, from a location near Rio Grande City, Texas, to another location near Rio Grande City, Texas, by means of a motor vehicle, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

**Count Three**

On or about July 23, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**JOSE ISMAEL LOPEZ**

knowing and in reckless disregard of the fact that Hilda Beatriz Saguay-Vizhco was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly transport, move, attempt to transport, and attempt to move said alien within the United States in furtherance of such violation of law, that is, from a location near Rio Grande City, Texas, to another location near Rio Grande City, Texas, by means of a motor vehicle, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

A TRUE BILL

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FOREPERSON

KENNETH MAGIDSON  
UNITED STATES ATTORNEY

  
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ASSISTANT UNITED STATES ATTORNEY